

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MICHAEL RAMOS

Case No.

Violations: Title 18, United States Code,
Sections 2251(a) and 2252A(a)(5)(B)

COUNT ONE

The SPECIAL JANUARY 2023 GRAND JURY charges:

Beginning from approximately in or around July 2022 and continuing to approximately in or around November 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MICHAEL RAMOS,

defendant herein, did knowingly employ, use, persuade, induce, and entice a minor, namely Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

The SPECIAL JANUARY 2023 GRAND JURY further charges:

Beginning from approximately in or around January 2022 and continuing to approximately in or around January 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MICHAEL RAMOS,

defendant herein, did knowingly employ, use, persuade, induce, and entice a minor, namely Minor B, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2251(a).

COUNT THREE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

Beginning from approximately in or around May 2022 and continuing to approximately in or around December 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MICHAEL RAMOS,

defendant herein, did knowingly employ, use, persuade, induce, entice and coerce a minor, namely Minor C, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2251(a).

COUNT FOUR

The SPECIAL JANUARY 2023 GRAND JURY further charges:

Beginning from approximately in or around May 2022 and continuing to approximately in or around December 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MICHAEL RAMOS,

defendant herein, did knowingly employ, use, persuade, induce, and entice a minor, namely Minor D, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2251(a).

COUNT FIVE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about January 30, 2023, at Chicago, in the Northern District of Illinois,
Eastern Division,

MICHAEL RAMOS,

defendant herein, knowingly possessed material, namely a iPhone 13 Pro Max, Model A2484, bearing serial number QW7FF93TDX, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), involving a prepubescent minor, such image having been shipped and transported using any means or facility of interstate and foreign commerce and in or affecting interstate commerce by any means, including by computer, and such image having been produced using materials that have been shipped and transported in and affecting interstate and foreign commerce by any means.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2023 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 2251 or 2252A as set forth in this Indictment, defendant shall forfeit to the United States of America any matter which contains visual depictions described in Title 18, United States Code, Section 2252A; any property constituting and traceable to gross profits and other proceeds obtained from such offense; and any property used and intended to be used to commit and to promote the commission of such offense, and any property traceable to such property, as provided by Title 18, United States Code, Section 2253(a).

2. The property to be forfeited includes, but is not limited to the following specific property: iPhone 13 Pro Max, Model A2484, bearing serial number QW7FF93TDX.

A TRUE BILL:

FOREPERSON

Signed by Erika Csicsila on behalf of the
ACTING UNITED STATES ATTORNEY